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STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION AND THE STATE OF THE STATE O

City of Chicago, People of Cook County)	00-0789	THE STATE OF THE PARTY OF THE PARTY.
Petition for Emergency Rulemaking and Expedited Investigation.)	00-0789	

PETITION OF MT. CARMEL PUBLIC UTILITY CO. TO INTERVENE

Now comes Mt. Carmel Public Utility Co., by its attorneys, Koger & Bramlet, P.C., and respectfully seeks leave to intervene in the above captioned proceeding and in support thereof states as follows:

- 1. Mt. Carmel Public Utility Co. is an Illinois Corporation with its principal place of business located at 316 Market Street, Mt. Carmel, Illinois.
- 2. Mt. Carmel Public Utility Co. is engaged in the business of distributing and selling electricity and natural gas as a public utility within the meaning of the Illinois Public Utilities Act, 220 ILCS 5/1-101, et seq.
- 3. A Petition for Emergency Rulemaking and Expedited Investigation was filed by on behalf of the City of Chicago, People of Cook County on December 8, 2000.
- 4. The Petition requests the Illinois Commerce Commission to initiate an emergency rulemaking proceeding to amend 83 Ill. Adm. Code Part 280 with regard to increased natural gas prices to customers.
- 5. Mt. Carmel Public Utility Co. is the smallest investor owned utility in the State of Illinois and its needs and positions cannot be adequately represented by any other party.
 - 6. Mt. Carmel Public Utility Co.'s intervention will not delay this proceeding.

WHEREFORE, Mt. Carmel Public Utility Co. respectfully requests leave to intervene in this proceeding.

DATED this 5th day of January, 2001.

Respectfully Submitted,

MT. CARMEL PUBLIC UTILITY CO.

Ву

Eric Bramlet

VERIFICATION

I, Eric Bramlet, first being duly sworn upon oath depose and say that I am Vice President and General Counsel for Mt. Carmel Public Utility Co., an Illinois corporation; that I have read the above and foregoing Petition by me subscribed and know the contents thereof; that said contents are true in substance and in fact, except as to those matters stated upon information and belief, and as to those, I believe same to be true.

ERIC BRAMLET, Vice President and General Counsel

Subscribed and sworn to before me this 5th day of January, 2001.

Eric Bramlet

Koger & Bramlet, P.C.

316 1/2 Market Street

P.O. Box 278

Mt. Carmel, Illinois 62863

Telephone: (618)263-3502

Attorneys for Mt. Carmel Public Utility Co.

Notary Public

OFFICIAL SEAL SHARON J GEHRET

NOTARY PUBLIC, STATE OF ILLINOIS MY COMMISSION EXPIRES:06/03/02

STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

City of Chicago,)	
People of Cook County)	
)	00-0789
Petition for Emergency Rulemaking)	
and Expedited Investigation.)	

NOTICE OF FILING AND CERTIFICATE OF SERVICE

TO: See Attached Service List

PLEASE TAKE NOTICE that on the 5th day of January, 2001, Mt. Carmel Public Utility Co. caused to be filed with the Chief Clerk of the Illinois Commerce Commission by depositing in a United States Post Office Box in Mt. Carmel, Illinois, the following documents contained in an envelope properly addressed with postage fully prepaid:

Petition of Mt. Carmel Public Utility Co. to Intervene Entry of Appearance Notice of Filing and Certificate of Service

DATED this 5th day of January, 2001

Eric Bramlet, Attorney at Law

CERTIFICATE OF SERVICE

The undersigned attorney does hereby certify that he served a copy of the foregoing listed documents on behalf of Mt. Carmel Public Utility Co., upon all parties listed on the attached Service List, by depositing same, with postage fully prepaid, in a U.S. Post Office box in Mt. Carmel, Illinois on the 5th day of January, 2001.

Eric Bramlet

Koger & Bramlet, P.C.

316 1/2 Market Street

P.O. Box 278

Mt. Carmel, IL 62863

618/263-3502

Service List 00-0789

Leijuana Doss & Marie Spicuzza Asst. State's Attorneys Environment and Energy Division Cook County State's Attorney's Office 69 W. Washington, Ste. 700 Chicago, IL 60602

Gerard T. Fox, Matthew A. Greene, James Hinchliff, Mary Klyasheff Timothy P. Walsh Attorneys for North Shore/Peoples Gas 130 E. Randolph Dr., 23rd Floor Chicago, IL 60601

Joseph L. Lakshmanan Illinois Power Company 500 S. 27th Street Decatur, IL 62521-2200

Karen Hunizenga MidAmerican Energy 106 E. Second Street Davenport, IA 52801

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